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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

OAKLAND DIVISION

EPIC GAMES, INC.,

Plaintiff, Counter-defendant,

v.

APPLE INC.

Defendant, Counterclaimant.

Case No. 4:20-CV-05640-YGR-TSH

**DECLARATION OF YONATAN EVEN IN  
SUPPORT OF EPIC GAMES, INC.'S  
OBJECTIONS TO SPECIAL MASTER  
DETERMINATIONS ISSUED MARCH 11  
REGARDING APPLE'S RE-REVIEWED  
DOCUMENTS**

Judge: Hon. Yvonne Gonzalez Rogers

1 I, Yonatan Even, declare as follows:

2 1. I am a Partner at Cravath, Swaine & Moore LLP, counsel to Epic Games, Inc.  
3 (“Epic”) in the above-captioned actions. I am admitted to appear before this Court *pro hac vice*.

4 2. I submit this declaration in support of Epic’s Objections to Special Master  
5 Determinations March 11 Regarding Apple’s Re-Reviewed Documents (“Objections”), dated  
6 March 17, 2025.

7 3. I have personal, first-hand knowledge of the facts set forth in this Declaration. If  
8 called as a witness, I could and would competently testify to these facts under oath.

9 4. Attached hereto as **Exhibit A** is a true and correct copy of the privilege log entries  
10 provided by Apple for the documents mentioned in the Objections.

11 5. Attached hereto as **Exhibit B** is a true and correct copy of a document that Apple,  
12 Inc. (“Apple”) has produced in this matter with Bates Stamp APL-EG\_11573161, which was  
13 admitted, with redactions, during the Evidentiary Hearings as CX-0223.

14 6. Attached hereto as **Exhibit C** is a true and correct copy of a document that Apple  
15 has produced in this matter with Bates Stamp APL-EG\_11573163, which was admitted, with  
16 redactions, during the Evidentiary Hearings as CX-0224.

17 7. Attached hereto as **Exhibit D** is a true and correct copy of a document that Apple  
18 has produced in this matter with Bates Stamp PRIV-APL-EG\_00228889.

19 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
20 and correct and that I executed this declaration on March 17, 2025 in New York, New York.

21  
22 /s/ Yonatan Even  
23 Yonatan Even  
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## **E-FILING ATTESTATION**

I, Yonatan Even, am the ECF User whose ID and password are being used to file this Declaration of Yonatan Even in Support of Epic's Objections to Special Master Determinations Issued March 11, 2025 Regarding Apple's Re-Reviewed Documents, dated March 17, 2025. In compliance with Civil Local Rule 5-1(i), I hereby attest that concurrence in the filing of this document has been obtained from the signatory.

/s/ Yonatan Even  
Yonatan Even